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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

THE CENTER FOR INVESTIGATIVE  
 REPORTING and MOHAMED AL ELEW,

Plaintiffs,

v.

U.S. ENVIRONMENTAL PROTECTION  
 AGENCY,

Defendant.

Case No. 4:21-cv-09680-HSG

STIPULATION AND ORDER TO  
 CONTINUE CASE MANAGEMENT  
 CONFERENCE

Pursuant to Civil Local Rule 6-1(a), the parties to this Freedom of Information Act action hereby stipulate and respectfully request that the Court take off calendar the Case Management Conference set for May 24, 2022, ECF No. 21, and continue it to June 14, 2021, or for another date convenient to the Court. The reasons for this request follow:

Through the meet and confer process, the parties have made significant progress in this case. To date, defendant has produced all but one of the documentation about the companies that plaintiff requested to be produced under the Freedom of Information Act, 5 U.S.C. § 552 *et seq.*

The parties last communicated on May 5, 2022, and agreed that since only the records of one

1 company are left to be produced, it would be more productive to postpone the case management  
2 currently schedule for May 24 by three weeks, until June 14, 2022, in order to give defendant the  
3 opportunity to determine if it will be able to produce the documents. By that time the parties expect to  
4 be in a better position to appraise the Court on whether all substantive FOIA issues have been resolved  
5 or if plaintiffs will file a summary judgement motion.

6 For the above stated reasons, the Parties respectfully request that the Court take off calendar the  
7 Case Management Conference set for May 24, 2022 and continue it to June 14, 2022. If this request is  
8 granted, the parties will submit a Joint Case Management Statement by June 7, 2022.

9 Respectfully submitted,

10 STEPHANIE M. HINDS  
11 United States Attorney

12 Dated: May 11, 2022

By: \_\_\_\_\_  
GIOCONDA R. MOLINARI  
Assistant United States Attorney

14 The Center for Investigative Reporting

16 Dated: May 11, 2022

By: \_\_\_\_\_  
D. VICTORIA BARANETSKY  
Attorney for Plaintiffs

18 In compliance with Civil Local Rule 5-1(i), the filer of this document attests that all signatories listed  
19 have concurred in the filing of this document.

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**ORDER BASED ON STIPULATION**

The Case Management Conference currently set for May 24, 2022, is continued to June 14, 2022, at 2:00 p.m. and will be held telephonically. The Parties will file a Joint Case Management Conference Statement by June 7, 2022.

DATED: 5/11/2022

  
HONORABLE HAYWOOD S. GILLIAM, JR.  
United States District Judge